



2019-2020 Positive Impact Plan

Cultivate Holdings, LLC (the “**Company**”) plans to positively impact the following individuals: (i) past or present residents of areas of disproportionate impact as defined by the Cannabis Control Commission; (ii) Massachusetts residents who have past drug convictions; and (iii) Commission designated Economic Empowerment Priority and Social Equity Program participants.

The Company will implement the following goals, programs and measurements pursuant to this Plan for Positive Impact (the “**Positive Impact Plan**”).

Goals:

The Company’s goals for this Positive Impact Plan are as follows:

1. Host ***two (2)*** networking events through the “Cultivate Launch Program”, described in more detail below.
2. Identify and recruit at least ***five (5)*** Economic Empowerment Program (“**EEP**”) and/or Social Equity Program (“**SEP**”) participants to participate in the Cultivate Launch Program.
3. Provide members of the Cultivate Launch Program with the opportunity to complete the Company’s standard ***employee training program*** and ***manager training program***.
4. Implement a charitable giving program wherein it will identify ***one day per month*** that an amount equal to ***ten percent (10%)*** of the Company’s gross sales from that day will be donated to charities that provide services to past or present residents of areas of disproportionate impact and/or who help Massachusetts residents with past drug convictions.

Programs:

In an effort to reach the abovementioned goals, the Company shall implement the following practices and programs:

1. The Cultivate Launch Program

The Company is extremely proud to begin implementing its new “Cultivate Launch Program” (the “**Program**”). The Program is designed to positively impact past or present residents of areas of disproportionate impact as defined by the Cannabis Control Commission; Massachusetts residents who have past drug convictions; and Commission designated Economic Empowerment Priority and Social Equity Program participants by providing a select number of participants with exclusive access to the Company’s training programs and introducing them to the industry through networking events. The Program will not be specifically limited in duration.



The Company will seek to identify and recruit at least five (5) participants in the Program during the first year. In an effort to ensure that the participants in the Program are past or present residents of areas of disproportionate impact as defined by the Cannabis Control Commission or Massachusetts residents who have past drug convictions it will: (1) Post monthly notices for the first six (6) months of the Program in newspapers of general circulation in those municipalities, including but not limited to, the Worcester Telegram and Gazette. These notices will state, among other things, that the Company is specifically looking for Massachusetts residents who are 21 years or older and either (i) live in an area of disproportionate impact as defined by the Cannabis Control Commission; or (ii) have past drug convictions, to participate in the program; (2) Review the Commission's database of approved EEP applicants and attempt to contact those eligible individuals; and (3) Reach out to Boston City Councilors who have expressed an interest in supporting and assisting SEP and EEP applicants.

Once enrolled, each participant in the Program will be offered the opportunity to complete the Company's standard employee training program and manager training program.

The standard employee and manager training programs will provide the participant with hands on training as a responsible vendor including: (1) an understanding of different products and methods of consumption including edibles; potency; effects; secondhand absorption time; (2) procedures to ensure that consumers are not overserved; and (3) procedures for mitigating the risk of an impaired consumer and ensuring the safety of patrons and the general public in the event of impairment. Additionally, these training programs will provide the participants with a review of any applicable department SOP's and compliance regulations and product knowledge training, including information regarding the methods that the Company uses to craft products, the strains that are cultivated and the intended effects of those products. Additional training is provided based on the department the participant is interested in. Collectively, between the manager training program and employee training program, Program participants will be offered up to 104 hours of training.

Furthermore, as described above, the Company will host two (2) networking events each year to introduce its program participants to the Massachusetts cannabis industry. The Company will partner with organizations such as the Commonwealth Dispensary Association, the Massachusetts Recreational Consumer Council and the Massachusetts Patient Advocacy Alliance for these networking events.

The Company has hired Yasue Keyes, who will serve as its community liaison and will be in charge of implementing the Program.

2. Designated Proceed Days:

The Company will implement a charitable giving program wherein it will identify one day per month where an amount equal to ten percent (10%) of the Company's gross sales from that day will be donated to charities that provide services to past or present residents of areas of disproportionate impact or who help Massachusetts residents with past drug convictions. Such donations may be made in that calendar month or in one lump sum at any point throughout the year.



These charities include Home Base Veteran and Family Care, Community Servings, Project Place, Project New Hope, Leukemia & Lymphoma Society, New England Chapter and the Crohn's & Colitis Foundation. Copies of letters from these charities confirming that they serve areas of disproportionate impact and/or Massachusetts residents with previous drug convictions as defined by the Cannabis Control Commission are attached hereto and incorporated herein by reference.

Annual Review:

Each year, the Company will review the following criteria in an effort to measure the success of its Plan to Positively Affect Areas of Disproportionate Impact.

1. Identify the number of individuals participating in the Program;
2. Identify the number of events it has held through the Program;
3. Identify the number of training hours provided to participants of the Program and
4. Identify the amount of charitable donations the Company has made during the positive impact plan year, and to which organizations those donations went (documentation from the abovementioned charities about whether or not they serve Areas of Disproportionate Impact, or residents with previous drug convictions, will be available for inspection by the Commission upon request).

The Company affirmatively states that it: (1) has confirmed that all of the abovementioned charities have (or will) accepted donations from the Company; (2) acknowledges and is aware, and will adhere to, the requirements set forth in 935 CMR 500.105(4), which provides the permitted and prohibited advertising, branding, marketing, and sponsorship practices of every Marijuana Establishment; (3) any actions taken, or programs instituted, will not violate the Commission's regulations with respect to limitations on ownership or control or other applicable state laws; and (4) the Company will be required to document progress or success of this plan, in its entirety, annually upon renewal of this license.



A RED SOX FOUNDATION AND
MASSACHUSETTS GENERAL HOSPITAL PROGRAM



July 26, 2019

This is to certify that Home Base serves past and present residents of Communities of Disproportionate Impact as designated by the Cannabis Control Commission, such as Abington; Amherst; Boston; Brockton; Chelsea; Fall River; Fitchburg; Haverhill; Holyoke; Lowell; Lynn; Mansfield; Monson; New Bedford; Quincy; Randolph; Revere; Spencer; Taunton; Walpole; Wareham and Worcester

Among the individuals we serve are those who have previous drug convictions.

Michael P. Almond



Joan H. Parker Building
18 Marbury Terrace
Jamaica Plain, MA 02130

617.522.7777
servings.org

July 18, 2019

To whom it may concern,

For the purposes of Cultivate LLC's Positive Impact Plan, this letter is to certify that Community Servings serves the following Communities of Disproportionate Impact:

- Brockton
- Lynn
- Revere
- Worcester
- Chelsea
- Haverhill
- Boston
- Quincy
- Braintree
- Fitchburg
- Lowell

I can be reached at 617-522-7777 for further inquiries.

Sincerely,

Darcy Pfeifer

Director of Development and Communications

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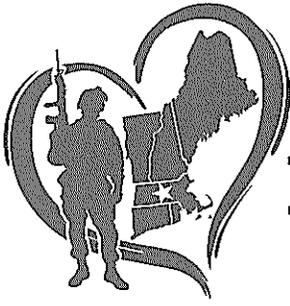
To Whom It May Concern:

Thursday, July 18, 2019

This signed document is to certify that Project Place serves past and present residents of Communities of Disproportionate Impact as designated by the CCC according to the Census Tracts. These include the neighborhoods of Dorchester, Jamaica Plain, Roxbury, and Mattapan in Boston. Among the individuals we serve are those who have previous drug convictions.

Sincerely,

Suzanne Kenney
Executive Director



Project New Hope INC.

Where Veterans
Rebuild With Honor

70 JAMES STREET, SUITE 157 • WORCESTER, MA 01603 • 508-762-9738 • FAX 508-304-9245
WWW.PROJECTNEWHOPEMA.ORG

July 22nd, 2019

Cultivate Holdings, LLC
1764 Main Street
Leicester, MA. 01524

Dear Ms. Yasue Keyes,

This is to certify that Project New Hope Inc. serves past and present veteran residents of Communities of Disproportionate Impact as designated by the Cannabis Control Commission, such as Spencer, West Springfield, Fitchburg, Holyoke and North Adams. Among the individuals we serve are those who may have previous drug convictions.

Regards,

**William H. (Bill) Moore | Executive Director
United States Air Force | Veteran**

Project New Hope Inc.
501(c)(3) EIN: 27-4555998
70 James Street, Suite 157
Worcester, Massachusetts 01603
Office: 508-762-9738

Project New Hope Inc.
Hampton Pond Plaza #9
1029 North Road/Route 202
Westfield, MA. 01085
Office: 413-315-3873
Fax: 413-322-0177



Cultivate Holdings LLC
Yasue Keyes
1764 Main Street
Leicester, MA 01524

July 25, 2019

Dear Yasue,

Thank you for your generous donation to the Leukemia & Lymphoma Society, New England Chapter. Our organization serves residents throughout Massachusetts including residents of all of the Communities of Disproportionate Impact as designated by the Cannabis Control Commission.

We provide financial assistance such as \$100 Patient Aid, \$500 Urgent Need, \$500, Other Medical Expenses, Co-pay Assistance of \$5,000-\$11,000.

We also have Family Support groups available throughout Massachusetts as well as online chat and live phone support that provide information on disease, medical, financial and nutritional resources.

Our research funding has provided over \$68 million to Boston Children's Hospital, Dana-Farber Cancer Institute, Harvard Medical School, Massachusetts General Hospital, and the University of Massachusetts Medical School.

Regards,

Lisa Calkins

Operations Manager

72 River Park Street
Suite 202
Needham, MA 02494

781.449.0324
info@crohnscolitisfoundation.org
www.crohnscolitisfoundation.org



July 25,2019

Dear Yasue,

This is to certify that the Crohn's & Colitis Foundation serves past and present residents of Communities of Disproportionate Impact as designated by the Cannabis Control Commission, such as Abington, Quincy, Lowell, New Bedford and Taunton.

Warm Regards,

Kristine Poirier
Deputy Executive Director

kpoirier@crohnscolitisfoundation.org